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NAS CECIL FIELD  
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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING DRAFT FEASIBILITY STUDY OPERABLE UNITS 3, 7 AND 8  
(OU3) (OU7) (OU8)NAS CECIL FIELD FL  
2/5/1997  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles  
Governor

Twin Towers Building  
3800 Mark Stone Road  
Tallahassee, Florida 32309-2400

Virginia B. Wetherell  
Secretary

## Department of Environmental Protection

February 5, 1997

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Commanding Officer  
Mr. Mark Davidson, Code 1879  
SOUTHNAVFACENGCON  
Post Office Box 190010  
North Charleston, SC 29419-9010

RE: Draft Feasibility Study, Operable Unit 3, Sites 7 and 8,  
Naval Air Station Cecil Field Florida.

Dear Mr. Davidson:

Mr. Greg Brown, P.E. and I have completed the technical review of the Draft Feasibility Study, dated December 1996 (received December 27, 1996) submitted for the above-referenced facility. Attached is a Memorandum from Mr. Brown, who states that the document is adequate for its intent. However his comments and those listed below should be adequately addressed before this document is resubmitted as Final.

1. Page 2-4, Section 2.2, the original lead detection of 178,000,  $\mu\text{g}/\text{kg}$  can not be eliminated from the risk assessment and the feasibility study.
2. Page 3-5, Section 3.2, 3rd paragraph, the BCT has and will always opt for unrestricted land use as a cleanup option, if reasonable.
3. Page 4-6 Section 3.3.1, the BCT has determined that if FDEP Soil Cleanup Goals (SCG) are exceeded either cleanup of surface soil will take place or institutional controls will be placed on the site. However, our preference is to determine if a surgical removal of contaminated soil will give the site unrestricted land use, thereby eliminating the institutional control and enabling the site to go No Further Action.
4. Page 3-13, Table 3-5, are the units presented in this table correct? Units for soil should always be presented in  $\mu\text{g}/\text{kg}$ .

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Mr. Mark Davidson  
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5. Page 3-17, Table 3-7, TEL and PEL should be removed from the Range of Reporting Limits column.
6. Page 3-25, Section 3.3.2, 1st paragraph, since a background value for beryllium has not been established. An institutional control will need to be implemented because of the exceedance of the Residential SCC.
7. Page 4-1, Section 4.1, a 5-foot by 5-foot area around each sample should not be assumed for excavation. The horizontal extent of benzo(a)pyrene contamination should first be delineated by collection of additional surface soil samples north, south, east, and west of CF78810 and CF75512.
8. Page 5-3, Section 5.1.1, the estimate of surface soil to be excavated may be underestimated based on Comment 7.
9. Page 5-9, Table 5-2, see Greg Brown Comment 4.
10. Figures 5-2 and 5-3, the BCT should address the need for a source area monitoring point to collect natural attenuation parameters, upgradient of CF8NW108.
11. Page 5-16, the Feasibility Study and ROD should include the immediate restrictions on the consumption of groundwater through an institutional control.
12. Page 5-21, Table 5-4, one of the reasons I have been pushing for a Generic Health & Safety Plan is to avoid the preparation of site specific Health and Safety Plans.

If you have any concerns regarding this letter, please contact me at (904) 921-9991.

Sincerely,

Michael J. Deliz, P.G.  
Remedial Project Manager

CC: Pat Kingcade, FDEP OGC/Natural Resource Trustee  
Satish Kastury, FDEP  
Ashwin Patel, FDEP Northeast District  
Debbie Vaughn-Wright, USEPA - Atlanta  
Lewis Shields, City of Jacksonville  
David Porter, SOUTHNAVPACENGCON

Enclosure (1)

TJB\_\_\_\_JCC\_\_\_\_BSN\_\_\_\_

**Memorandum****Florida Department of  
Environmental Protection**

**TO:** Mike Deliz, P.G., Remedial Project Manager,  
Technical Review Section

**THROUGH:** Tim Bahr, P.G., Supervisor, Technical Review Section *3*

**FROM:** Greg Brown, P.E., Professional Engineer II, *JB*  
Technical Review Section

**DATE:** January 9, 1997

**SUBJECT:** Draft Feasibility Study for Operable Unit 3, NAS  
Cecil Field, Jacksonville, FL.

I reviewed the subject document dated December 1996 (received December 27, 1996). I have the following comments that you and your team should consider:

1. Section 3.0; Is the ELCR the average or reasonable maximum estimate of risk? If it is the average, is the BCT comfortable with that? For example, are there unquantifiable factors not explicit in the FS that justify the use of the average risk estimate for risk management decisions?
2. Section 3.0; Tables J-5, and perhaps others. This table reports units as ng/kg. The values in the "Range of Reporting Limits," however, do not appear to be consistent with these units and may be a few decimal points off.
3. Section 4.2; Should the feasibility of natural attenuation be determined before the final selection of remedy is made?
4. Table 5-2; Site 7, Alternative 1. Workplan preparation is estimated at \$12,500 while Total Direct Cost ranges from \$14,500 to \$25,400. Is the planning effort excessive for the proposed remedy?
5. Section 5.0; The preferred remedy suggests an escalation of institutional controls as a contingency if natural attenuation is a failure. This does not appear adequate. The Navy should compare the life-cycle costs of institutional controls, long-term monitoring, and natural resource loss with an active restoration alternative to justify contingencies for natural attenuation failure.

Please call me if you have questions.

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